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## NOTE

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From: General Secretariat of the Council  
To: Permanent Representatives Committee

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Subject: PREPARATION FOR THE COUNCIL (ENVIRONMENT) ON 16  
DECEMBER 2025  
Draft Council conclusions on Europe's Environment 2030 - Building a more  
climate resilient and circular Europe  
- Approval

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1. On 13 March 2024, the Commission submitted its Mid-Term Review of the 8<sup>th</sup> Environment Action Programme (8<sup>th</sup> EAP)<sup>1</sup> assessing progress towards the six 2030 priority objectives for Europe's Environment set out in the 8th EAP: on greenhouse gas emissions reductions, adaptation to climate change, circular economy, zero pollution, biodiversity protection, and reduction of pressures from production and consumption, based on the ambitions and initiatives in the European Green Deal.
2. On 29 September 2025, the European Environment Agency (EEA) presented its latest report on the state of the European environment 'Europe's environment 2025'.
3. Both the Mid-Term Review and the EEA report conclude that despite progress made, further efforts are needed, including in relation to implementing actions and measures to meet the 2030 priority objectives in the areas of climate adaptation and circular economy.

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<sup>1</sup> Document 11326/24 + COR 1.

4. In its 2026 Work Programme, the Commission has announced initiatives on an ‘European integrated framework for climate resilience’ and on a ‘Circular Economy Act’. The integrated framework for climate resilience will aim at ensuring that preparedness for climate impacts becomes a permanent feature of EU policy, while the Circular Economy Act will aim at fostering demand and supply of circular products and reduce dependencies on critical resources, and continuing to speed up the implementation and investment under the Clean Industrial Deal.
5. Against this background, the Presidency proposed a set of Council conclusions aimed at setting out the Council’s priorities and ambition for the upcoming initiatives on climate resilience and circular economy.
6. The draft conclusions were examined by the Working Party on the Environment (WPE) at its meetings on 17 October, and 7 and 24 November 2025.
7. The meeting on 24 November 2025 resulted in a text of the draft Council conclusions<sup>2</sup> that received broad support subject to scrutiny reservations entered by a number of delegations. Following written consultation, all delegations were able to accept the text without changes. The text is set out in the Annex to this note.
8. Consequently, the Committee of Permanent Representatives is invited to confirm the agreement on the draft conclusions as set out in the Annex with a view to their approval by the Council (Environment) at its meeting on 16 December 2025.

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<sup>2</sup> Document 13681/3/25 REV 3.

**Europe's Environment 2030 - Building a more climate resilient and circular Europe**  
**- draft Council conclusions -**

**THE COUNCIL OF THE EUROPEAN UNION,**

1. RECALLS the Decision on the 8th Environment Action Programme (EAP)<sup>1</sup> and the Communication from the Commission on the European Green Deal<sup>2</sup>, the global goal on climate adaptation set out in Article 7 of the Paris Agreement<sup>3</sup>, and the UN 2030 Agenda for Sustainable Development (in particular SDG 12 and SDG 13)<sup>4</sup>.
2. REAFFIRMS previous Council conclusions, in particular those of 17 June 2024 on the mid-term evaluation of the 8th EAP<sup>5</sup> and their comprehensive guidance to promote the objectives set out in the programme. CALLS ON the Commission and Member States to deliver on the ambitions as set out in these conclusions.
3. WELCOMES the report of the European Environment Agency on Europe's Environment 2025<sup>6</sup> as well as the Agency's monitoring reports on progress towards the 8th EAP objectives, which should serve as the basis for high level political dialogues and UNDERLINES the Agency's role in providing objective, reliable and comparable information to inform environment and climate policies.
4. RECOGNISES the insufficient progress towards the objectives set out in the 8th EAP, the unsatisfactory state of nature and biodiversity and their integral role in climate resilience and circular economy.

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<sup>1</sup> Decision (EU) 2022/591 of the European Parliament and of the Council of 6 April 2022 on a General Union Environment Action Programme to 2030 (OJ L 114, 12.4.2022, p. 22).

<sup>2</sup> Document 15051/19 + ADD 1.

<sup>3</sup> OJ L 282/9, 19.10.2016, p. 4.

<sup>4</sup> [Sustainable Development Goals: 17 Goals to Transform our World | United Nations](#).

<sup>5</sup> Document 11326/24 + COR 1.

<sup>6</sup> EEA: Europe's Environment 2025 ([link](#)).

5. REGRETS that the Commission has not presented a legislative proposal to add an annex to the 8th EAP with actions for the period post-2025 to address the insufficient progress towards the 8th EAP objectives. REITERATES the request to the Commission, based on Article 5(2) of the 8th EAP, to present a legislative proposal to add an annex to the 8th EAP with actions for the period post-2025 to maintain its continuity and ambition.
6. RECALLS that EAPs provide transparency and a long-term commitment of all relevant actors on how a green transition can be achieved in an economically beneficial and socially just way, and should contain concrete actions to ensure predictability and reliability.

## **I. OVERARCHING REMARKS**

7. RECOGNISES the interlinkages between climate resilience, circularity, and other environmental objectives such as the protection and restoration of biodiversity, soil and ecosystems, water quality and quantity and pollution prevention and control.
8. UNDERLINES that stepping up action on climate resilience and the circular transition is increasingly urgent, given the triple planetary crisis of climate change, pollution and biodiversity loss. Such action will contribute to the overall preparedness and security of our societies, Europe's competitiveness, and drive innovation while at the same time protecting citizens, businesses, infrastructures, and ecosystems from threats such as environmental degradation, extreme weather events, droughts, floods, rising sea levels, forest fires, water stress, resource scarcity, and negative impacts on human health.
9. EMPHASISES that actions must ensure a just transition and just resilience, protecting in particular the most vulnerable groups, while leaving no-one behind.
10. UNDERLINES the need to ensure effective protection of the environment through full and effective implementation of adopted legislation.

11. RECOGNISES that significant investments are necessary to promote climate resilience and circularity objectives and STRESSES the importance of ensuring adequate and accessible financing by mobilising both public and private resources, including available EU-funding. STRESSES that the levels of risk exposures and costs of inaction should be considered when assessing the needs of climate resilience and circularity initiatives. UNDERLINES that the costs and damages due to inaction or insufficient action are expected to be significantly higher than effective action. HIGHLIGHTS estimates that the cost of not implementing EU environmental law amounts to €180 billion per year in relation to current environmental targets, rising to €325 billion per year in relation to environment targets which will apply in the near future<sup>7</sup>. TAKES NOTE OF estimates that the investment gap for the circular economy in the EU amounts to EUR 27 billion per year<sup>8</sup>. Further HIGHLIGHTS that weather- and climate-related extremes caused about 822 billion EUR of damage to assets in the EU in the past 40 years, and that 25% of these costs have occurred in the last four years<sup>9</sup>, and that the expectation is that they continue to increase.
12. WELCOMES the intention of the Commission to further address challenges related to climate resilience and circularity, including through the upcoming proposals for a Circular Economy Act and an Integrated Framework for Climate Resilience, while ensuring coherence with other key EU initiatives such as the Preparedness Union Strategy and the Water Resilience Strategy.

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<sup>7</sup> European Commission: Update of the costs of not implementing EU environmental law ([link](#)).

<sup>8</sup> European Commission: 2025 Environmental Implementation Review ([link](#)).

<sup>9</sup> European Environment Agency: Economic losses from weather- and climate-related extremes in Europe ([link](#)).

13. HIGHLIGHTS the overarching principles of subsidiarity and proportionality and the importance of respecting existing national systems, specificities and best practices. HIGHLIGHTS the importance of avoiding unnecessary administrative burdens for competent authorities and businesses as one of the key enablers for competitiveness. UNDERLINES that simplification should not impede or lower the level of health, climate resilience and environmental protection, should follow the principles of better regulation and should ensure long-term legal stability and predictability for business and society.
14. UNDERLINES that measures and actions should take into account the different geographical, climatic, economic and social conditions in Member States and regions, including outermost regions, small island Member States, and the Arctic.
15. UNDERLINES that strengthening the climate resilience of natural systems is essential for supporting the long-term natural removals of greenhouse gas emissions.
16. EMPHASISES that primary and secondary biomass is the foundation of a circular bioeconomy, and an important contribution to a prosperous European society, thus WELCOMES the presentation of the Commission's Bioeconomy Strategy as a vehicle for maintaining sustainable and circular use of natural resources, including agricultural and forestry materials and energy in all Member States.
17. EXPRESSES DEEP CONCERN over the extensive environmental degradation, pollution, and resource depletion resulting from Russia's ongoing war of aggression against Ukraine, which has led to severe and long-lasting damage to ecosystems, infrastructure, and communities. STRESSES that such destruction undermines efforts to build a circular and climate-resilient Europe, while exacerbating vulnerabilities to pollution, biodiversity loss, and climate change.

## II. CLIMATE RESILIENCE

18. NOTES WITH CONCERN that many of the risks identified in the European Environment Agency's report on European Climate Risk Assessment (EUCRA) have reached critical levels and could become catastrophic unless urgent and decisive action is taken.
19. EMPHASISES that climate resilience is fundamental for the Union's security, prosperity and competitiveness. STRESSES that transformational change is needed to make the Union and Member States better prepared and more resilient.
20. UNDERSCORES the strategic importance of climate resilience as a fundamental pillar for safeguarding public health and well-being, social cohesion, and for ensuring the long-term preservation of natural heritage. ACKNOWLEDGES the importance of social dimensions in shaping future policy actions related to climate resilience.
21. RECOGNISES that climate risks vary significantly between Member States and within regions; UNDERLINES the need for flexibility to ensure that actions are appropriately targeted towards the most significant risks and the most vulnerable groups and sectors. STRESSES, in this regard, the importance of addressing the specific adaptation needs of Member States and regions disproportionately affected by climate hazards, and CALLS for enhanced cooperation on prevention, preparedness and response capacity at Union level.
22. UNDERLINES the importance of cross-border cooperation, including well-functioning cross-border early warning systems, to tackle transboundary climate risks and the importance of EU-level cooperation to address shared transboundary, cross-sectoral and cascading risks.

### *Competitiveness and innovation opportunities*

23. EMPHASISES the economic opportunities, not the least for SMEs, arising from the need to further develop and enhance the uptake of innovative climate resilience technologies, products, and services, including with a view to securing leadership on the global market.

24. INVITES the Commission and Member States to promote research and foster innovation, thereby contributing to solutions benefitting concomitantly climate resilience, ecosystem restoration, pollution reduction, disaster risk reduction, and competitiveness and STRESSES the need to improve knowledge about costs, benefits, business opportunities and inclusion of social justice in solutions for climate resilience.

*Climate resilience by design*

25. CALLS FOR pro-active integration of climate resilience across all relevant legislation and policies, sectors, and governance levels, taking into account existing legislation, initiatives and plans.
26. NOTES that linking climate resilience by design and the early planning stage, budgeting and infrastructure unlocks multiple benefits and improves sustainable investment opportunities.
27. RECOGNISES the necessity of cross-sectoral engagement, involving all relevant stakeholders in the design and implementation of policies that build climate resilience. UNDERLINES the importance of a sector-specific approach to climate resilience to ensure targeted responsibility for risk assessment and NOTES that clear sectoral risk ownership is key for accountability and targeted responses to the unique vulnerabilities and needs of each sector; EMPHASISES that cross-sectoral considerations including coordination and cooperation of all relevant stakeholders and governance levels are fundamental in order to reduce risks of maladaptation and maximise synergies.
28. UNDERLINES the importance of healthy ecosystems, biodiversity and scaling up of nature-based solutions as cost-effective means for climate resilience so that these solutions are systematically used when relevant.

### *Legal framework*

29. WELCOMES the Commission's plans to develop a legal framework to support climate resilience action at EU and at various levels of governance in Member States, through assessing the merits of elements such as common definitions, objectives, goals, common temperature reference scenarios/trajectories for climate resilience decisions, methodologies for climate risk assessments, clarification of risk ownership, toolbox and learning framework; UNDERLINES the overarching principles of subsidiarity and proportionality, taking into account local specificities and context, and STRESSES the need for assessment and management of transboundary climate risks as well as systemic threats to competitiveness, security and prosperity of the EU as a whole.
30. RECOGNISES the importance of strengthening monitoring and evaluation of climate resilience efforts at EU and Member State levels in order to better support the effective implementation of adaptation actions and HIGHLIGHTS the need to identify opportunities to streamline, improve, and simplify existing reporting requirements, thereby enhancing transparency and effectiveness.

### *Financing and insurance*

31. UNDERSCORES that sufficient financing remains key to ensure climate resilience action; RECOGNISES that both private and public financing are necessary to mobilise the necessary funding and investments for climate resilience building.
32. HIGHLIGHTS the importance of available EU funding instruments and programmes in facilitating the implementation and financing of climate resilience measures at national, regional, and local level.
33. STRESSES the importance of ensuring accessible and affordable insurance to address residual risks.

### *Digital tools and citizens empowerment*

34. UNDERLINES the need for easy and accessible information on climate resilience; ENCOURAGES improved collection and use of data to facilitate information exchange and cooperation between Member States; UNDERSCORES the role of digital tools in facilitating access to information and raising awareness and STRESSES that new or improved digital tools should be based on the needs of the end-users.
35. Further ACKNOWLEDGES, that digitalisation can have significant impact on reducing administrative burden while at the same time improving the quality of data for example through improved registries and appropriate reporting obligations.
36. SUPPORTS public participation and enabling evidence-based decision-making for citizens, businesses, and policy-makers as key elements in promoting fairness, inclusiveness, and social cohesion towards climate resilience.

### *Local and regional governance*

37. RECOGNISES the importance of a whole-of-government cross sectoral approach involving actors at local and regional levels in building climate resilience and EMPHASISES that future policy actions should support local and regional capacities and measures, and STRESSES that enhancing tools and capacity-building for regional and local actors is essential, including through leveraging on the experiences of the EU Mission on Adaptation and by supporting Member States in tailoring resilience strategies to local conditions and encouraging early stakeholder engagement to ensure inclusive and regionally adapted solutions, to ensure effective implementation.

### III. CIRCULAR ECONOMY

38. NOTES that the International Resource Panel's Global Resources Outlook 2024 concludes that the circular economy can play a significant role in addressing climate change and biodiversity loss and underlines the role of further resource efficiency and reduction in material demand.
39. CONFIRMS the need for a comprehensive, efficient and effective legislative framework on circular economy to bring about and accelerate systemic change towards the EU's long-term objectives and ensure the necessary enabling conditions as set out in the 8th EAP, as well as ensuring incentives necessary for the circular transition.
40. REITERATES the importance of swift implementation of adopted legislation and development of the upcoming secondary legislation.
41. REITERATES the need for an integrated EU long-term vision for the transition to a circular economy and sustainable resource use and UNDERLINES the importance of prioritising the top tiers of the waste hierarchy.
42. WELCOMES the Commission's intention to present a Circular Economy Act to enable transition to a circular economy, boost competitiveness, economic security, high quality green jobs, resilience, strategic autonomy, and to support the environmental and climate objectives in the 8th EAP, while ensuring synergy and alignment with the EU's industrial policy objectives.
43. INVITES the Commission based on a comprehensive impact assessment to appropriately address barriers and bottlenecks through existing legislation to speed up the circular transition, ensure predictability, policy coherence, simplification and effective implementation, while ensuring a high level of health and environmental protection.
44. CALLS ON the Commission to maintain the focus on all the key sectors with high environmental impacts, high strategic relevance<sub>2</sub> and high potential for circular solutions as identified by the 6th priority objective of the 8th EAP.

*Facilitating implementation, simplification, and EU added value*

45. UNDERLINES the potential of digitalisation and harmonisation of data as tools for better management and simplification.
46. STRESSES the importance of establishing harmonised definitions, methodologies, and indicators at EU level that address each level of the waste hierarchy and ensure the priority order from prevention, to preparing for re-use, recycling, other recovery, and disposal to enable coherent monitoring, progress evaluation, and impact assessment.
47. SUPPORTS the continued work of the Commission on harmonisation and digitalisation of Extended Producer Responsibility and exploring its further application, taking into account national specificities and context. STRESSES the need to regulate distance selling and online platforms and to ensure adequate enforcement tools to ensure that all operators, within the EU and from third countries, comply with product safety and legal compliance requirements, including Extended Producer Responsibility, consumer and environmental protection, including in relation to both import and export of products, used goods, and waste, in order to guarantee a level playing field, while ensuring that EU meets its international obligations.

*Creating a Single market for secondary raw materials*

48. HIGHLIGHTS the importance of a well-functioning single market for secondary raw materials as a precondition for reducing material extraction, enhance recycling, circularity and security of supply, in particular for secondary critical minerals under the Critical Raw Materials Act; and in that context, UNDERLINES the importance of strengthening efforts to ensure the quantity and quality of recycled materials and INVITES the Commission to address clear market failures and fragmentation and improve the free movement of circular products and secondary materials.
49. RECOGNISES that circular business and the market for secondary raw materials often cannot compete with the import of cheaper virgin materials; ENCOURAGES the Commission to work on a fair, competitive secondary materials market with demand for EU recyclates and explore potential pricing and stimulating mechanisms to level the playing field between circular and linear business models and to ensure that materials produced from waste, collected, and processed outside the European Union comply with environmental and health standards equivalent to EU standards.
50. CALLS for systematically ensuring a fair and level playing field for recycled materials from third countries especially when contributing to European regulatory targets for the incorporation of recycled materials, whilst respecting international commitments, and CALLS on the Commission to combat dumping practices.
51. CALLS on the Commission to strengthen EU-added value through further harmonisation and development of end of waste criteria and updated waste codes with a view to ensure more consistent implementation, combat illegal waste shipments, and facilitate the single market for secondary raw materials, as well as eliminating the bottlenecks that hinder the integration of recycled and re-used materials into economic flows.

52. **ACKNOWLEDGES** the need to further stimulate supply and demand side measures for secondary raw materials for example by improving and increasing separate waste collection and recycled content requirements, positive market-based incentives, and quality standards for secondary raw materials.
53. **RECALLS** the important role of innovation at all stages of the recycling value chain, including the design stage, in producing European recycled raw materials capable of meeting the needs of European manufacturers in terms of quantity, quality, and at a reasonable cost. In this regard, **CALLS** on the European Commission to make the circular economy a priority in its support programmes.
54. **EMPHASIZES** the need to ensure a level playing field and effective market surveillance to preserve European competitiveness in a fair and circular Single market.
55. **HIGHLIGHTS** the need to address any ambiguous and inconsistent interfaces between waste, product, and chemical legislation and the importance of establishing non-toxic material cycles by a rapid phase-out of harmful substances to support access to and confidence in sustainable and high-quality recycled materials. **CALLS ON** the Commission to fully implement the Chemical Strategy for Sustainability with a particular focus on revising and modernising REACH. **UNDERLINES** that harmonization and guidelines on the application of product and chemical legislation is needed and should aim to ensure that secondary raw materials are safe to use and comply with EU legislation. Further **EMPHASIZES** the importance of ensuring a legal framework that enables the chemical industry to accelerate efforts to overcome the various technical and economical constraints to the development of the most resource-efficient and sustainable chemical recycling.

*Sustainable consumption and production*

56. UNDERLINES the importance of enabling sustainable resource use as it supports climate and environmental objectives, drives economic growth and competitiveness, secures the supply of raw materials, strengthens supply chain resilience, and fosters innovation in technologies and business models, including through fiscal measures.
57. ACKNOWLEDGES the need to realise the full potential for waste reduction and prevention of material extraction through further incentives to increase durability, reparability and reuse of products, servitisation, and the facilitation and incentivisation of circular business models and ENCOURAGES the Commission to ensure this as part of the Circular Economy Act.
58. UNDERLINES the importance of the Ecodesign for Sustainable Products Regulation (ESPR) and URGES the Commission to maintain full support, to timely implementation of, and where possible, acceleration of the ESPR-work plan and the timely delivery of the EU Digital Product Passport.
59. CALLS ON the Commission to establish design requirements for electrical and electronic equipment that cover the full product lifecycle, in particular on reparability, reuse, upgrade, and recyclability, and set clear collection, recovery and treatment standards for components and materials, especially critical raw materials.
60. UNDERLINES the significant potential for public procurement to act as a driver for circular economy and the need to take further action to promote green public procurement that encourages the uptake of EU-made products and services, while preserving a level playing field, prioritises durability, reparability, reuse, and resource efficiency, and enables procurement of second-hand, refurbished and remanufactured products, and products-as-a-service, thereby supporting circular business models and creating demand for sustainable products and services in the Union.
61. EMPHASISES the importance of EU level tools such as EU Ecolabel and EMAS to ensure better products on the EU market.

62. EMPHASISES the importance of consumers and the need for reliable information and awareness-raising to empower consumers, inter alia to avoid misleading practices such as green-washing. ENCOURAGES the Commission to define mandatory information requirements for impactful product groups, including labels, under the Ecodesign for Sustainable Products Regulation. INVITES the economic actors to apply the environmental footprinting methods established by the Commission to underpin eco-score labelling systems that are compatible and reflect the environmental impacts of products. In this context, INVITES the Commission to ensure transparency in the governance of the development and validation of these methods. In this context, UNDERLINES the importance of EU and Member State level awareness-raising campaigns to facilitate circular consumer choices.
63. SUPPORTS infrastructure innovation in collection, sorting, reuse, preparation for reuse, and recycling technologies to advance the circular economy and STRESSES the importance of providing targeted support, in different ways, for SMEs, particularly those active in repair, reuse, rental, and sharing sectors.

#### *International Action*

64. SUPPORTS the continued negotiations and outreach to develop an ambitious and effective international legally binding agreement to end plastic pollution, including in the marine environment, based on a comprehensive approach that addresses the full life cycle of plastic.